



June 29, 2026

The Honorable Brett Guthrie
Chairman
Committee on Energy and Commerce
2161 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Frank Pallone
Ranking Member
Committee on Energy and Commerce
2107 Rayburn Office Building
Washington, D.C. 20515

RE: *Support for Inclusion of Carter-Clarke Optical Lab Freedom Amendment to HR 9393*

Dear Chairman Guthrie and Ranking Member Pallone,

We are writing today on behalf of millions of American consumers and health care patients as the respective leaders of the National Consumers League, the nation's oldest consumer advocacy organization, and Patients Rising, a leading national patient advocacy organization dedicated to advancing patient access to affordable, high-quality health care.

For years, our organizations have raised concerns about the growing consolidation and vertical integration occurring throughout the health care marketplace. Nowhere is that trend more evident, or more harmful than in the vision insurance market, where Vision Benefit Managers (VBMs) increasingly control nearly every aspect of the patient experience, often at the expense of transparency, competition, provider independence, and consumer choice.

As outlined in the 2026 Government Accountability Office report, the VBM market is highly concentrated. In some states, two VBMs control more than 85 percent of the employer-sponsored market, while a single company controls more than 80 percent in certain states. At the same time, the largest VBMs have become increasingly vertically integrated, owning or controlling vision insurance plans, optical laboratories, eyewear manufacturers, retail optical chains, and growing numbers of eye care practices.

This level of market concentration allows a small number of companies to dictate contractual terms, restrict competition, and steer patients through a system that they own and control.

For that reason, we strongly support the targeted vision insurance reforms recently offered by Representatives Buddy Carter and Yvette Clarke (Carter-Clarke Amendment 135) during the House Energy and Commerce Health Subcommittee markup last week. Although the amendment was ultimately withdrawn, it reflected a thoughtful, bipartisan effort to focus on two common sense reforms that deserve the committee's consideration.

These provisions which mirror the bipartisan Senate legislation backed by nearly 25 senators, S. 1716, and are key pieces of the widely supported DOC Access Act (HR 1521) address key issues of

transparency, costs, patient choice, and protecting patient-doctor decision-making. The amendment would make it transparent to millions of American consumers that their vision insurer - through a Vision Benefit Manager (VBM) - is forcing them to use the optical laboratory owned or controlled by their insurer/VBM (often leading to higher costs, inferior products and production, and unnecessarily long wait times for a finished pair of prescription eyeglasses). Armed with this knowledge, the amendment would give consumers the freedom to use the VBM-owned or controlled lab or to choose another optical lab that works best for the patient based on cost, quality, and convenience.

We were encouraged by Chairman Brett Guthrie's comments during the Health Subcommittee markup recognizing that these are exactly the kinds of bipartisan, constructive reforms the committee should continue to pursue. We also appreciate the work of both majority and minority staff, who have engaged thoughtfully with stakeholders to refine this proposal into a narrowly tailored package that addresses legitimate consumer concerns.

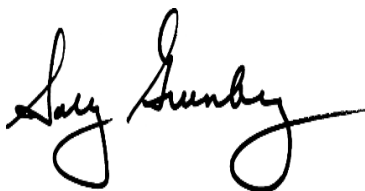
As organizations dedicated to protecting patients and consumers, we believe these provisions are entirely consistent with the committee's efforts to improve transparency and accountability throughout the health care system.

Accordingly, we respectfully urge the House Energy and Commerce Committee to advance these targeted reforms as part of its ongoing health care work. Whether through a manager's amendment or another legislative vehicle, these provisions deserve serious consideration.

Greater transparency, fairer contracting practices, and preserving doctors' ability to select the laboratory that best serves their patients are practical, bipartisan reforms that will directly benefit millions of Americans.

We stand ready to work with the Committee to advance these important protections and appreciate your continued leadership on behalf of patients and consumers.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally Greenberg". The signature is fluid and cursive, with a large, sweeping "S" at the beginning.

Sally Greenberg
Chief Executive Officer
National Consumers League

A handwritten signature in black ink, appearing to read "Terry Wilcox". The signature is cursive and somewhat stylized, with a large "T" at the beginning.

Terry Wilcox
Co-Founder & CEO
Patients Rising